

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TONY ROQUE, a Washington Resident,

Plaintiff

v.

SEATTLE HOUSING AUTHORITY, a Public
Entity,

Defendant

NO. 2:20-cv-658-RAJ

PLAINTIFF'S STATUS REPORT

Plaintiff through his undersigned counsel, submits this Status Report as required by the Court's order of March 1, 2021.

I. Status of the Temporary Restraining Order and Mr. Roque's Reasonable Accommodation

The temporary restraining order entered by the Court remains in effect pending the Court's decision on Plaintiff's motion for preliminary injunction. To date, with the additional order of the large signage, the TRO has been effective, and the Court ordered reasonable accommodation has allowed Mr. Roque's caregivers to park in the one reserved spot in order to provide him with the care he needs to allow him the "equal opportunity to use and enjoy" his unit as required by the Fair Housing Act. Plaintiff is not aware of any administrative or financial

1 burden to the Seattle Housing Authority – nor has SHA made Mr. Roque specifically aware of
2 any such burden to date. Plaintiff urges the Court to rule on his pending motion for Preliminary
3 Injunction and retain the injunction requiring SHA to provide Mr. Roque with his reserved
4 parking space and previously ordered signage.

5 **II. Litigation Status**

6 Discovery is ongoing, and Mr. Roque anticipates completing discovery by the May 17,
7 2021 deadline in accordance with the Court's order. (Dkt. 51). The parties entered into a
8 stipulated protective order to facilitate the exchange of information. (Dkt. 56). Plaintiff will be
9 requesting supplemental discovery before the end of March and noticing depositions for April.
10 Plaintiff currently anticipates taking a deposition pursuant to Fed. R. Civ. P. 30(b)(6) as well as
11 to depose a few of the fact witnesses. Plaintiff's counsel will confer with SHA's counsel to
12 agree on dates for those depositions. At present, based on the anticipated continued cooperation
13 of SHA's counsel, Plaintiff does not anticipate needing to seek an extension to discovery.

14 After the close of discovery, Plaintiff anticipates filing a motion for summary judgment
15 on liability by the June 15, 2021 deadline, and will meet and confer with defendant per this
16 Court's standing order prior to filing.

17 **III. Potential for Settlement/Mediation**

18 While there have been no further settlement discussions with SHA, Plaintiff believes that
19 this case should settle, preferably before expending more time and money on depositions and
20 discovery. However, Plaintiff believes that a mediator would be helpful to bring the parties
21 closer together. If the Court were willing to renew its prior offer of referral to a Magistrate
22 Judge of this Court for mediation, Plaintiff would eagerly accept such a referral.

Respectfully submitted this 4th day of March, 2020 at Seattle, Washington by:

s/ Conrad Reynoldson

Conrad Reynoldson

WSBA# 48187

conrad@wacda.com

(206) 876-8515

WASHINGTON CIVIL & DISABILITY ADVOCATE

4115 ROOSEVELT WAY NE, SUITE B, SEATTLE, WA 98105

s/Thomas Zito

Thomas Zito

PRO HAC VICE

tzito@dralegal.org

(510) 529-3412

s/ Sean Betouliere

Sean Betouliere

PRO HAC VICE

sbetouliere@dralegal.org

(510) 529-3428

DISABILITY RIGHTS ADVOCATES

2001 CENTER STREET, 4TH FLOOR, BERKELEY, CA 94704

Attorneys for Plaintiff Tony Roque

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record for Defendants.

DATED this 4th of March, 2021, at Seattle, Washington.


Rachel Pollard, Legal Intern